

Enclosure 2a

November 14, 2018

Public Comment

Proposed Regulations Governing the Certification
of Educators in RI



RIDE Rhode Island
Department
of Education

We must invest in our people: Why educator preparation, employment, and ongoing professional learning must be at the center of our work

- **Large and persistent performance gaps between Rhode Island and Massachusetts**
- **Large equity gaps between student subgroups within Rhode Island**
- **Our largest district is under a Department of Justice order for English Learners**

We proposed updates to our current regulations in four areas:

- **Ensure new teachers are ready for Day 1 of teaching**
- **Provide more opportunities for schools and teachers to find the right employment match**
- **Build educator professional learning pathways**
- **Other program and technical updates**

There were extensive reviews, discussions, and improvements to the proposed regulations before the formal public comment period began:

- **The proposed regulations include initiatives that have been discussed in Rhode Island for many years**
- **There were extensive discussions with stakeholders, including the Council, superintendents, principals, teachers, higher education organizations, etc.**
- **Multiple revisions were made to improve the proposal that was eventually posted for formal public comment**



Based on extensive feedback, major revisions were made to the proposed regulations before the formal public comment period began:

- Higher education institutions were given more flexibility to increase teacher practical experience in preparation programs
- The Council was provided with a mechanism to approve each and every shortage area before the implementation of the alternate pathway
- Clarifications were made that a teacher could teach one class out of certification only if there was evidence of competency in the non-certified assigned area
- Clarifications were made in the conditions under which educator misconduct must be reported to RIDE
- Professional learning was modified to make clear that teacher-teacher collaborations (PLCs) were allowable, that RIDE would have the ability to ensure offerings were available to all teachers statewide, and that superintendent approval decisions would be guided by a district-wide professional development plan with stakeholder agreement



By the Numbers: During Public Comment

4 Public Hearings

Davies- 15

Portsmouth-9

PCTA-19

North Kingstown-22

Written Comment

56 Emails and letters

131 Survey responses

1 Petition

Trends in Public Comment

- Reporting Misconduct 1.4- RIFTHP expressed concern for reporting allegations and wants to know more about what RIDE does with the data. Another commenter noted that the safety of students is always a primary concern.
- One-Year Practical Residency 1.6- Some commenters expressed concern about the requirement being onerous and creating challenges with placements. A small number supported the requirement as a step toward better preparation.
- Reciprocity with Mass and CT 1.7- Many educators supported expanded reciprocity with these 2 states. The concern expressed was the one-way nature of the regulation.



Trends in Public Comment (cont'd)

- Professional Learning 1.8- Themes included concerns about the number of units, potential cost, the possible burden on teachers, the sustainability expectations, the local approval process, and responsibility for certification renewal expectations. Some people requested clarity around a list of allowable activities and expressed concern for how districts manage tracking as well as districts providing opportunities.
- Career and Technical Educator 1.9.4- The RIFTHP petition was submitted in opposition to the alignment of the degree expectation with industry expectations. Other organizations supported this change.

Trends in Public Comment (cont'd)

- Expert Residency Shortages/Cultural Competence 1.8.11- Individuals submitted comment concerned about a requirement that doesn't seem to require everyone to be culturally competent. The RIFTHP petition also stated that the term was vague and undefined.
- Endorsements 1.8.13- Most comment received supported endorsements as an effort to recognize expanded competencies.
- Professional Standards 1.9- Several commenters expressed concern about removing specific association names from the listing of professional standards in the regulations

Trends in Public Comment (cont'd)

- Assignment Flexibility 1.9- The primary concern expressed was the assignment of educators to areas for which they do not have expertise. Some concerns stated that students could suffer and that this could create a loophole for supporting ELLs. Some fully supported the flexibility.
- ESL and BDL/DL 1.9- Most comments were generally supportive of the pathways created to allow teachers to move from one certificate to another. Clarifications were requested for second language proficiency in bilingual or dual language settings. Concerns included the removal of the organization name in listing standards and a possible reduction in rigor.

Trends in Public Comment (cont'd)

- Registered School Nurse 1.9.5- Many comments expressed concern around a reduction in requirements. Individuals and associations provided comment that school nursing is a specialty and requires specialized training to work in schools. School nurses and RIFTHP opposed the creation of a second type of school nurse certificate and provided comment that current requirements should remain in place to ensure adequate health services for students. A small number of individuals supported the proposal because it's difficult to find nurses and they believe nurses would be adequately trained to support schools without teacher training.

Timeline

March 27, 2018:	Conceptual discussion
April 24, 2018:	1st read proposed revisions
May 9, 2018:	2nd read-Special Work Session proposed revisions
May 15, 2018:	3rd read-Discussion proposed revisions
June 19, 2018:	4th read proposed revisions
July 17, 2018:	Discussion- modifications to red-lined version
August 21, 2018:	Discussion – modifications to red-lined version and approval for public review and comment
October 23, 2018:	Discussion of public comment
November 27:	Discussion of final draft of proposed regulations
December 4:	Vote on proposed regulations

Summary of Public Comment- October 23, 2018

Regulations Governing the Certification of Educators in Rhode Island

Section/Topic	Commenters	Summary of Comment
General Comment	PK-12 Teacher RI Building Trades Officers and Council Members- 9500 members	Educator does not support alternate routes to certification Commenter, on behalf of 9,500 members, is in support of the proposed changes to the teacher certification standards as drafted.
General Comment- Expand elementary to include K	@2 PK-12 Administrator	The commenter would like to have K included with the elementary grade range and states that teaching K is not that different from teaching grade 1. The current grade ranges limits how teachers can be assigned in these grades. Additionally, the administrator finds it difficult to provide services to K students with disabilities.
General Comment- Review and vote on as a 133 page packet	@2 educator FSEHD at RIC	The commenters object to reading and voting on proposed certification regulations as a 133 page packet. Allowing 2 minutes to speak to a 130 page packet is not enough time The Feinstein school note that there are too many important decisions based on research that must be considered. These significant issues should not be voted upon as one 133 page packet.
General Comment- Board members at hearings	Frank Flynn (RIFTHP) Maribeth Calabro (Providence Teachers Union)	Commenters stated that they felt more board members should be present at public hearings.
General Comment- Evaluation	Kathleen Torregrossa- Coordinator of Ed Evaluation, PL and Mentor Programs in Cranston- representing 1000 educators	Proposed regulations contain language that disqualifies individuals if they have an ineffective rating and it is not clear if this is within the educator's renewal cycle.

		Disagree with the comparison to IPlan and proposed 30 PLU requirement, the number is the same but IPlan did not require sustained PD for 10 hours on one topic.
1.4.4, 1.4.5 Reporting requirements	RI Federation of Teachers and Health Professionals (RIFTHP) @ 2 PK-12 Educators	RIFTHP is concerned about language in 1.4 B 6 (a), (b), (c), (e), (f). They object to the reporting of allegations as outlined in the proposed regulations. RIFTHP is wondering the purpose of these extensive reporting requirements and what RIDE will do with this data. Individuals asked for a simple definition of misconduct and “romantic activity” as the term is too vague and undefined. Another commenter supported the reporting and noted that the safety of students is always a primary concern
1.5 B Certification Fees	@1 PK-12 administrator	Costs of Emergency Certificates are significant and should be reduced. The cost is 500% more expensive than the fee for a professional certificate (\$200 for one year versus \$200 for five years) and 600% more expensive than an initial certificate (\$200 for one year versus \$100 for three years). Commenter explained that Emergency certificates are allowable for hard to fill positions and the fee is a financial barrier for candidates. Also recommended that the emergency certificate application fee be waived entirely.
1.6.C.2 and 1.9 One-year Practical Residency	@4 PK-12 Educators RI College Feinstein School of Education Educator Preparation Program Faculty	Commenters expressed concern about the requirement being onerous for people who need to work while earning their teaching degree. They also noted that the big question for RIDE will be to ensure that we are making the clinical experience more meaningful.

	<p>URI</p> <p>TeachPlus RI Fellow</p> <p>RI Federation of Teachers and Health Professionals Petition- 2683 signatures</p> <p>Greater Providence Chamber of Commerce</p> <p>Association of Independent Colleges and Universities of RI (AICU)</p> <p>Warwick Teachers Union (representing approx. 900 teachers)</p>	<p>One faculty member for library/media provided specific testimony for the URI program. She expressed concern that the one year requirement could create a barrier for what is already a shortage area.</p> <p>A small number of PK-12 educators provided comment in support of a one year practical residency. A TeachPlus RI Fellow provided testimony and fully supports moving to a one-year practical residency as a means to foster more effective and ready educators.</p> <p>One commenter specifically noted that this is like the medical model and is much needed.</p> <p>The RIFTHP Petition states that the proposed requirement will have a negative impact on pre-service candidates. It states that the proposal would increase the requirement for traditionally prepared teachers while allowing TFA and other alternate route candidates to be certified based on a less rigorous requirement. They states that this will cause a challenge in finding additional placements for student teachers, additional clinical faculty and cooperating teachers as well as the possibility that fewer schools/cooperating teachers would be willing to take student teachers. RIFTHP recommends that this proposal either be reconsidered or amend the requirement for alternate route candidates.</p> <p>RIFTHP also opposes maintaining 60 hours of additional field experience in addition to the one-year residency. They state that it will impose a significant financial and time burden on students. The proposal would add tuition costs and could be a barrier to diversity. RIFTHP suggests considering the 60 hours as part of the practical residency requirement, not an addendum.</p> <p>The Providence Chamber of Commerce states that through meaningful development teachers will be able to meet the unique needs of students and close achievement gaps. Teachers who experience a full year of residency will have a more robust skill set before earning initial</p>
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		<p>certification, which will result in a more educated and prepared workforce.</p> <p>The Association of Independent Colleges and Universities of RI state that the proposed amendments complicate current, relatively clear guidance for the length, timing and scope of student teaching. They state that the one-year practical residency is vague, ambiguous and subject to interpretation. They also note that this requirement appears to impose a requirement for school districts to allow student teachers to have a “full teaching load”. They ask for clarification on the terms used for the one-year practical residency. They also ask for clear guidance around what “equivalent clinical time” could look like to satisfy the one-year requirement and again note that as written there are multiple interpretations. AICU also pointed out a technical edit needed around the use of terms one-year residency and one-year practical residency.</p>
<p>1.7 D Reciprocity Mass and CT</p>	<p>@ 11 PK- 12 Educators</p> <p>Educator Preparation Program Faculty or Administrator</p> <p>Association of Independent Colleges and Universities of Rhode Island</p>	<p>Several comments were supportive of the expanded reciprocity with our 2 neighboring states as a way to remove barriers and expand the talent pool in RI. Reciprocity should be available to all educators, not solely CT and MA.</p> <p>Other comments simply stated that this is a good change and there was surprise that this wasn’t already in place.</p> <p>One comment questioned why we would include the dependency certificates and comments that places like UConn offer rigorous and effective programs.</p> <p>One educator preparation program faculty opposed the proposal for reciprocity but comments were related to renewal and earning a master’s degree.</p> <p>AICU comments that RI membership of AICU does not support automatic eligibility to applicants from any other state unless those states offer full</p>

		<p>reciprocity for holders of RI certificates. The current proposal reflects a one-way benefit to applicants who are certified by the two neighboring states.</p>
<p>1.8.2-4 Professional Learning</p>	<p>@100 PK-12 Educators</p> <p>Warwick Teachers Union (representing approx. 900 teachers)</p> <p>Educator Preparation Program Faculty or Administrator</p> <p>RI Federation of Teachers and Health Professionals Petition- 2683 signatures</p> <p>Kathleen Torregrossa- Coordinator of Ed Evaluation, PL and Mentor Programs in Cranston- representing 1000 educators</p>	<p>Almost all PK-12 educators who provided comment stated that 150 Professional Learning Units is too high. They stated that it would force them to have to do more than what is provided by the district and this would impose a time burden and financial burden. Some educators stated that they already participate in PD in their districts and it is sufficient.</p> <p>Many teachers are concerned with the high cost and the manner in which professional learning units are earned is problematic. Here is one example provided: Both husband and wife are both teachers; both would need to take classes and attend workshops on evenings and weekends. Husband already has a second job to provide daycare for two children and pay other bills.</p> <p>Many educators expressed the sentiment that these regulations place additional burdens on a profession that is already underpaid and undervalued.</p> <p>Educators noted that school districts are not allowing teachers to attend professional association conferences on school days and it undermines the ability to tailor PD to ones content. Many educators also expressed concern about district level decisions for what is allowable as well as the decisions around district sign off after professional learning is completed.</p> <p>A few educators noted that the proposal does not provide for an adequate appeals process for disputed PLUs.</p> <p>Almost all educators are concerned about the 75% sustained requirement. They feel that by having to meet an expectation of sustainability it would impose a time and financial burden. At least one</p>

		<p>individual noted an understanding of the research and why it had been built into the requirement but still felt that it would create burdens on educators. Other individuals were concerned that the sustained requirement might force them to do coursework instead of professional development.</p> <p>A few educators commented that they already have a local process for setting goals and planning professional learning as part of evaluation processes and were concerned that this would be in addition to that work.</p> <p>RIDE is the certifying agency so why are districts given the authority to approve the professional learning units. Shouldn't RIDE be responsible for this? The burden falls on districts to monitor recertification renewals.</p> <p>One commenter noted that we require PD plans for students. Educator believes that we should have them for educators as well.</p> <p>One higher education faculty member commented that there is support for alternative pathways for certification but is concerned that RI does not require a master's degree as some other states do. The individual also reported concern with the lack of satisfaction with "in house" professional development yet this type of professional development is being proposed to support English learners. This individual states that s/he has seen the difference at URI between people who have pursued higher education since earning a license and those who do not and states that the skill set of those who have pursued higher education is higher. So, if we as a state do not believe all of our teachers should earn a master's degree, we should, at a minimum, ensure the highest quality training is in place for those in pursuit and maintenance of teacher licensure.</p>
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	<p>New England Laborer's/ Cranston Public Schools</p> <p>2 Career and Technical Center Directors</p> <p>Chairperson RI Career and Technical Education Directors</p>	<p>The RIFTHP Petition requests that the bachelor's degree requirement be restored for CTE teachers and notes that it would be the only area of certification for which a bachelor's degree is not required.</p> <p>The CTE Board of Trustees Chair submitted comment that he is fully supportive of the proposal. New England Laborers/Cranston Director and the Woonsocket Director also expressed full support for the proposed changes.</p>
<p>1.8.11 Expert Residency-Shortages (Cultural Competency)</p>	<p>@3 PK-12 Educators</p> <p>Public Higher Education Faculty Member</p> <p>Feinstein School of Education, RI College</p> <p>Warwick Teachers Union (representing approx. 900 teachers)</p> <p>RI Federation of Teachers and Health Professionals Petition- 2683 signatures</p> <p>Greater Providence Chamber of Commerce</p> <p>Association of Independent Colleges and Universities of Rhode Island (AICU)</p>	<p>One individual commented that this will be hard to enforce as cultural responsiveness because it has many meanings. The individual also noted that the fact that RIDE included a new standard for education leaders focused on equity and cultural responsiveness is a big signal to the field.</p> <p>One individual commented specifically that all teachers need to be culturally responsive, attentive and competent. Rhode Island College also provided comment that all teachers need to be culturally competent and incorporate culturally responsive practices and they oppose the creation of the certificate.</p> <p>Cultural competence 5B requirement is extremely vague with no tangible definition. No clear evidence of how to demonstrate the qualifications. No way to actually measure the candidate's level of cultural competence. To further compound the issue the certificate is valid for 3 years.</p> <p>Another individual commented that moving the certificate from a one year to three year is beneficial because we need to attract talent to these areas.</p> <p>The RIFTHP Petition states the proposal is based on an undefined concept referred to as Cultural Competence and asks that this vague, undefined concept not be included in the new regulations.</p>

		<p>The Providence Chamber of Commerce noted that fewer than 25% of most traditional educator prep programs are graduating individuals certified to teach secondary math and science. They note that this has left us with significant shortages in STEM areas. They note that RI also has shortages in special education and ESL; therefore they support the Expert Residency Shortages certificate as a pathway to alleviate shortages and provide students with greater access to educators.</p> <p>AICU provided comment that agrees with the premise that educators should be sensitive to the impact of culture of student learning but noted that the term Cultural Competence is vague. They also note that the proposal establishes this as a separate pathway and ask how such competence will be measured.</p>
1.8.13 Endorsements	@3 PK-12 Educators	<p>Most of the public comment was in support of adding Endorsements as a way to demonstrate additional talents and skills.</p> <p>One individual did express concern that an Endorsement for general educators supporting ELLs could lead to a reduction of qualifications for teachers who teach ELLs as one of our most marginalized populations.</p>
1.9, 1.10, 1.11 Striking Names of Professional Standards	@2 Educator Preparation Program Faculty or Administrator	<p>2 individuals from educator prep programs commented that the names of professional standards should not be removed from the certification regulations. One of the individuals expressed concern about the erosion of standardization for program development and accountability and felt the rigor of licensure could be reduced.</p>
1.9 A. Allowable 20% out of area of certification	<p>@9 PK- 12 Educators</p> <p>RI Federation of Teachers and Health Professionals Petition- 2683 signatures</p>	<p>Many of the educators expressed concerns about Superintendents placing teachers in assignments when they aren't qualified.</p> <p>Commenters noted that the change is not in the best interest of students. Examples provided included a social studies teacher being assigned to teach chemistry.</p>

	<p>Warwick Teachers Union (representing approx. 900 teachers)</p> <p>RI English Learner Advisory Council</p>	<p>Others noted that parents would be upset about this and indicated it could adversely impact NEASC Accreditation.</p> <p>One person noted that fiscally poorer communities would see test scores go even lower.</p> <p>One person stated that educators should not be held accountable to teach in fields outside of our areas of expertise.</p> <p>One person wrote in full support of the proposal and noted its importance for high schools.</p> <p>The RIFTHP Petition states that this undermines the very essence of mandatory content specific certification and represents significant erosion of the certification process and value of students being taught by highly qualified certified professionals. They request the deletion of this provision.</p> <p>RI English Learner Advisory Council stated that this proposed certification regulation could create a loophole for non-certified teachers to teach EL courses. They also noted a technical concern: The term 'English to Speakers of Other Languages' is used in parts of the regulation, while other parts 'English as a Second Language ' is used. The terms being used interchangeably leads to potential confusion and lack of clarity. The Council would like to recommend the term "Emergent Bilingual" in place of "English Language Learner".</p> <p>One administrator stated that this would be critical for high schools where there are a limited number of qualified candidates in math, science, special education and ESL. Instead of seeking emergency certification or needing a long-term sub to fill vacancies, a teacher could be assigned to teach a section based on interest and expertise. This</p>
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		change will also afford more flexibility to be creative in developing courses based on teacher and student interest.
1.9.1,1.9.2,1.9.3, 1.9.4, 1.9.5 Bilingual/Dual Language and English as a Second Language Certificate Pathways	Rhode Island Teachers of English Language Learners (RITELL) RI English Language Learner Advisory Council @3 PK- 12 Educators and URI professor	RITELL is supportive of pathways to move between the certificates. Would like to add English Linguistics to the list of requirements for adding an ESL certificate. The Advisory Council also supports the pathways to move between certificates. Both organizations request expansion of PD requirement that all teachers holding an ESL certification and working in a Dual Language and Bilingual setting demonstrate language proficiency in the second language with an intermediate or higher level of proficiency through PD or college credits. The Council would also like RI to explore an option for individuals in other states who have a stand-alone TESL certificate. Commenters expressed concern about removal of TESOL standards from document. Commenters also requested consideration to change terms to Emergent Bilingual instead of English Language Learner. Two commenters noted that English should be assigned as the official language used to teach in schools and too much money and other resources are spent of ELL. A URI professor expressed a concern about reducing the rigor in requirements and not providing the strongest teachers to students who have the greatest need like ELLs. The individual noted that if we're not going to require Master's Degrees then we do need to ensure the highest training.
1.9.5 All Grades Deaf/Hard of Hearing	@3 educators	Would like RIDE to introduce a second certificate that does not require ASL. Concerned about the current ASL requirement as something everyone must have.

<p>1.9.5 J All Grades Registered School Nurse Certificate</p>	<p>@ 86 Educators and administrators</p> <p>RI College Faculty (Health and Physical Education, FSEHD and the Feinstein School generally)</p> <p>RI Certified School Nurse Teacher Association(RICSNTA)</p> <p>RI School Social Worker Association</p> <p>RI School Superintendent Association</p> <p>RI Federation of Teachers and Health Professionals Petition- 2683 signatures</p> <p>American Nurses Association (ANA-RI)</p> <p>NEA/ South Kingstown President</p> <p>Warwick Teachers Union (representing approx. 900 teachers)</p>	<p>The majority of people who provided public comment expressed concern for the second pathway to certification.</p> <p>Many of the comments expressed concern around the ability of an individual providing nursing services using the second certificate. People expressed concern that RNs do not have the preparation needed to understand schools, health programs, screenings, IEP development and support, mental health supports, immunizations, and FERPA rules. They expressed concern that health services for students will suffer if there are two pathways and they provided comment that the current structure of one certificate should remain in effect.</p> <p>Individuals providing comment commented that SNTs are the first line of defense for students with medical needs, behavioral needs and mental health needs. They described the role of the school nurse teacher as a specialty within nursing that the preparation generally of a RN would not include. They stated that school nursing requires unique knowledge and preparation that RNs are not trained for They indicated that the coursework required for certification is what prepared them for their roles as school nurse teachers. They expressed concern for a lower quality of care if the requirements are changed given the critical role school nurses play in the educational context. They expressed that their roles are much more than providing Band-Aids and distributing medications and trained nurses without the education preparation do not understand the environment of schooling.</p> <p>Professors from RI College provided comment that the 8 courses currently required at RIC should remain. The classes prepare individuals for classroom management, curriculum development and working in small and large groups. They also noted that if the proposal passes, the word teacher should be removed from the certificate name and individuals should not be allowed to work in classroom or consulted for IEPs or school environment safety plans.</p>
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		The RIFTHP Petition asks that the provision for a sub-category of Registered School Nurse be removed. They also note that this is a departure from a 1976 legislative mandate.
1.10.2 B District Level Administrator – Special Education	PK-12 Administrator	Individual commented that an internship should be required.
1.12 A 2 Day to Day Substitute Teachers	<p>PK-12 Administrator</p> <p>RI Federation of Teachers and Health Professionals Petition- 2683 signatures</p>	<p>This change would expand the pipeline of potential teachers by allowing aspiring teachers to earn an income while completing their undergraduate education. It would be one way to make a degree in education attainable for a greater diversity of candidates, thereby providing a pathway for more teachers of color who would bring additional cultural competence and community connections to our classrooms.</p> <p>The RIFTHP Petition states that the current minimum of a bachelor’s degree should be maintained.</p>